

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MICHAEL LAWRENCE LOMBARDO,	:	
	:	
Plaintiff,	:	CIVIL No. 2:24-cv-01711-KBH
	:	
v.	:	
	:	
CHRISTOPHER BRYAN LEONARD	:	Honorable Kelley Brisbon Hodge
	:	
and	:	
	:	
IMS TECHNOLOGY SERVICES, INC.,	:	
	:	
Defendants.	:	

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**DEFENDANT IMS TECHNOLOGY SERVICES, INC.’S MOTION TO DISMISS  
PLAINTIFF’S AMENDED COMPLAINT**

Defendant IMS Technology Services, Inc., by through its undersigned attorneys, files this Motion to Dismiss Plaintiff’s Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6) seeking to dismiss IMS as a party, and in support of its Motion relies upon the accompanying memorandum of law, which is incorporated herein by reference.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Alexander Nemiroff  
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Alexander Nemiroff (PA ID #92250)  
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*Attorneys for Defendant*  
*IMS Technology Services, Inc.*

Dated: June 24, 2024

**CERTIFICATE OF SERVICE**

I certify that on this 24th day of June 2024, Defendant IMS Technology Services, Inc.'s Motion to Dismiss, supporting brief, and proposed Order were electronically filed and are available for viewing and downloading from the ECF system by the following:

Michael Lawrence Lombardo  
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*Pro se Plaintiff*

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*Counsel for Defendant Christopher Bryan Leonard*

Dated: June 24, 2024

/s/ Alexander Nemiroff  
Alexander Nemiroff (PA ID. #92250)

**MEET & CONFER CERTIFICATION**

I certify that on May 20, 2024, undersigned counsel spoke with Plaintiff regarding this motion to dismiss, but the efforts to meet and confer were unsuccessful and the parties were unable to reach a resolution, causing Plaintiff to file an Amended Complaint.

Dated: June 24, 2024

/s/ Alexander Nemiroff  
Alexander Nemiroff (PA ID. #92250)